

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

CASE NO. 00-6282-CR-FERGUSON

Plaintiff,
vs.

ROBERT SCHACHNER,

Defendant.

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MOTION FOR PERMISSION TO TRAVEL

The Defendant, **ROBERT SCHACHNER**, by and through undersigned counsel hereby moves this Honorable Court for an Order granting the Defendant permission to travel for the purposes of attending the Midem Trade Show in Cannes, France. In support of this Motion the Defendant would state the following grounds and facts:

1. On February 2, 2001 the Defendant was Sentenced to 3 years supervised release with a special condition of 11 months house arrest.
2. Since the Defendant's Sentencing he has adhered to all terms and conditions of his house arrest.
3. The Defendant is self employed through a company named Lyra Productions based out of his residence in Tavernier, Florida.
4. Through Lyra Productions, the Defendant is solely responsible for the sales, marketing and manufacturing of recorded music and intellectual property. For the past 35 years the Midem International Music Market Trade Show has been held, wherein over 10,000 participants representing over 4,500 company

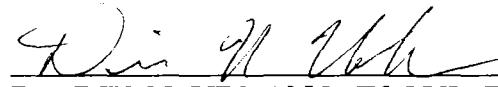
gather, including record companies, distributors, music publisher, agents, promoters and other technology companies to generate business.

5. This trade show in the past has been the primary source of clients for the Defendant.
6. Permitting the Defendant to attend will give him the opportunity to increase the quantity of business thereby earning more money and enabling him to continue to make his restitution payments.
7. It should be noted that the Defendant has been in the business of sales, marketing and manufacturing of recorded music for over 45 years.
8. Because of the Defendant's medical condition, his attendance would be based upon a final approval of the doctors at the medical transplant center prior to leaving. In addition, his attendance would also be contingent upon the Defendant's ability to maintain his medication schedule and have medical treatment available prior to his arrival in France.
9. If the Court permits the Defendant to travel and the proper medical clearances and arrangements have been made, the Defendant would leave Miami, Florida for Canes, France on January 16, 2002. He would then leave Canes, Frances and travel to London on January 27, 2002. He would remain in London where he would attend additional sales meetings until January 30, 2002 when he would return to Miami, Florida.

10. The Defendant's sole purpose in making this trip is to promote a business in which he has been involved for over 45 years. The Defendant's present medical condition will make this trip complicated and at best difficult. However, the Defendant believes that the financial benefit to himself and his ability to meet the obligations set forth by this Court would be well served.
11. Undersigned counsel has contacted United States Probation Officer Paul J. Cresce, who does not have a position on this Motion and will defer to the Court for a Ruling.
12. Undersigned counsel has also contacted Assistant United States Attorney Robin Rosenbaum, who does not have a position on this Motion and will defer to the Court for a Ruling.

WHEREFORE, the Defendant requests this Honorable Court grant the Defendant's Motion and if the Defendant's medical condition permits allow the Defendant to fly from Miami, Florida to Canes, France on January 16, 2002 and then travel from Canes, Frances to London on January 27, 2002 and returning to Miami on January 30, 2002.

Respectfully submitted,



DENNIS N. URBANO, ESQUIRE
On behalf of ROBERT SCHACHNER
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was **mailed** to the following: The United States Attorney's Office, Robin Rosenbaum, **A.U.S.A.**, 500 East Broward Blvd., 7th Floor, Fort Lauderdale, Florida, 33394, and U. S. Probation Officer **Paul J. Cresce**, 301 Simonton Street, Room 230, Key West, Florida, 33040 on this 19th day of December, 2001.



DENNIS N. URBANO, ESQUIRE